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FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

ORIGINAL

FILE

Room 222
Dockets

17 FEB 1993

IN REPLY REFER TO:
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FEB 23 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. Richard L. Merrill
1507 Wildwood Lane
Lutz, Florida 33549

Dear Mr. Merrill:

This is in reply to your letter of January 25, 1993, to Congressman Michael Bilirakis regarding the Notice of Proposed Rule Making (Notice) in PR Docket No. 92-235, 57 FR 54034 (1992). This Notice proposes comprehensive changes to the Commission's Rules governing the private land mobile radio services operating in the frequency bands below 512 MHz.

Those rules have been in place for over 20 years. While they have been amended on numerous occasions since that time, they nonetheless embody regulatory concepts based on yesteryear's technology and, unless changed, will stifle the growth and development of private land mobile radio technology and services, which are used primarily by local governments, public safety entities, and businesses to enhance their productivity. The Commission issued the Notice, therefore, to solicit comment from all interested persons on a wide variety of proposals designed to increase channel capacity, to promote more efficient use of these channels, and to simplify the rules governing use of these channels.

The proposals in the Notice reflect to a large extent concepts and proposals submitted in the initial inquiry stages of this proceeding. None of the proposals set forth in the Notice, however, are engraved in stone. Indeed, the proposals represent our best judgment at this stage of the proceeding on steps that must be taken to improve the regulatory climate for users of the private land mobile radio spectrum below 512 MHz. To this end, some of the critical issues that must be resolved relate to channel spacing, the amount of time provided to users to convert to new technical standards, how the 300 to 500 percent increase in channel capacity should be licensed, how the rules should be written to provide users technical flexibility, and whether the current nineteen radio services should be consolidated and, if so, how. I have enclosed for your information a copy of that part of the Notice that describes the numerous proposals.

You are specifically concerned about the impact of these changes on radio control (R/C) hobby users. Enclosed is a discussion paper concerning our proposals for the 72-76 MHz band. In short, we expect there would be no adverse impact on R/C operations because of any proposal contained in the Notice.

No. of Copies rec'd
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Mr. Richard L. Merrill

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We are, of course, sensitive to the concerns of both users of private land mobile radio spectrum and R/C hobbyists. We will, therefore, take into careful consideration all your comments. As indicated in the Notice, we remain convinced that without significant regulatory change in radio operations in the bands below 512 MHz, the quality of communications in the private land mobile radio services will continue to deteriorate to the point of endangering public safety and the national economy.

We want to thank you for your interest in this proceeding. Comments on the proposals set forth in the Notice are due May 28, 1993, and Reply Comments are due July 14, 1993. We expect final rules to be issued in 1994. We urge you to file formal comments on all aspects of the proposals.

Sincerely,

A handwritten signature in dark ink, appearing to read "Ralph A. Haller", is written over a circular stamp or seal.

Ralph A. Haller
Chief, Private Radio Bureau

Enclosures:

Notice

Order

Discussion paper

Copy to: Honorable Michael Bilirakis
House of Representatives
2432 Rayburn House Office Building
Washington, D.C. 20515

Congressional

DUF82-12-93

PLEASE MAKE 2 EXTRA COPIES OF INCOMING, ATTACHMENTS,
AND REPLY FOR DOCKET FILE, ROOM 222.

CONGRESSIONAL CORRESPONDENCE TRACKING SYSTEM 02/05/93

LETTER REPORT

CONTROL NO.	DATE RECEIVED	DATE OF CORRESP	DATE DUE	DATE DUE OLA(857)
9300414	02/05/93	02/02/93	02/18/93	

TITLE	MEMBERS NAME	REPLY FOR SIG OF
Congressman	Michael Bilirakis	BC

CONSTITUENT'S NAME	SUBJECT
several	inq. comments on PR Docket 92-235

REF TO	REF TO	REF TO	REF TO
PRE/mm 2-5-93	PJP		
DATE	DATE	DATE	DATE
02/05/93	2/5/93		

REMARKS: Direct response to constituents. Copy to the
D.C. office.

doc names: 9300414 (for Merrill)
Stellwagen
Crowell

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MICHAEL BILIRAKIS
9TH DISTRICT, FLORIDA

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Congress of the United States
House of Representatives
Washington, DC 20515-0909
February 2, 1993

PRB
92-235
414

PLEASE RESPOND TO:

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WASHINGTON, DC 20511-0909
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(813) 441-3721

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HOLIDAY, FL 34691
(813) 847-1022

408 WEST RENFRO STREET
SUITE 107F
PLANT CITY, FL 33566
(813) 752-9280

Legislative Liaison
Federal Communications Commission
Office of Congressional and Public Affairs
1919 M Street, N.W.
Washington, D.C. 20554

Dear Sir or Madam:

I am enclosing, for your review, a copy of comments which I received from several of my constituents.

In summary, they are concerned that the F.C.C. plans to create more land mobile frequencies by splitting them into narrower bandwidths and rearranging the band plan. If this is done many who own radio controlled models will lose not only the time enjoyed using these models, but the money that was invested in the purchasing of this expensive equipment.

I would appreciate your thorough review of the attached comments. Please forward your response directly to my constituents.

I would also be grateful if you would send a copy of your response to my Washington, D.C. office.

Thank you for your prompt attention to this matter.

With best wishes, I am

Sincerely yours,

Mike Bilirakis
Michael Bilirakis
Member of Congress

MB:hs

380158

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January 14, 1992

The Honorable Michael Bilirakis
United States House of Representatives
Washington, DC 20515

JAN 25 1993

Dear Congressman Bilirakis,

This letter is being written in response to a notice of proposed rule making, by the F.C.C., known as NPRM - PR DOCKET 92-235.

I am 41 years old and an active r/c modeler, F.C.C General Class License Holder, and upon receipt of call/license, a Technician class amateur operator. I am also the 1993 President of one of the largest r/c aircraft clubs in Florida, the West Pasco Model Pilots Association in Odessa. The F.C.C.'s' proposed addition of land fixed/mobile 1 watt stations between our existing r/c channels will be potentially disastrous both incident wise and financially to model aircraft clubs and flyers.

Our existing equipment is "narrow band" and operating well with 20khz channel spacing which came into play these last few years. Our particular club, chartered under the Academy of Model Aeronautics, is using all model aircraft channels allotted by the F.C.C.. Members, including myself, went to great expense to upgrade their radios. Many had transmitters that could not readily be modified, and these have been "junked" or relegated to "home museum pieces". Receivers were either exchanged by their manufacturers for a price or were also "junked" and replaced with new, after-market approved units.

Active model fields were glad to obtain an increased number of channels which helped to relieve the congestion caused by too few frequencies. The thoughts of losing these or of the F.C.C.'s perception that interference will not occur strikes me as unreal! We already must contend with powerful paging systems existing between several of our new channels. Most of our receivers can function in this environment with the pagers only 10khz away, but operation with unknown locations (ie...portable) of 2.5khz away emissions at power levels exceeding our transmitters is sheer suicide to the flyer!

Models and modelers have "grown up" since the early days of r/c. Construction techniques have changed and aircraft weights may go up to 55 lbs depending upon the clubs' chartering organization. A modern aircraft of modest weight, "out of control", is not a pretty thought. I personally fly r/c helicopters. The typical "impact velocity" of the main rotor blades, at speed, exceed that of a .22 cal bullet fired "point blank".

I have steadily seen this hobby grow in a positive manner. Reliability of radio systems, engines, and construction techniques has improved by quantum leaps since its' inception in the early 1900's. Please don't bring it down by increasing our chances for accidents or forcing us to "huddle together" in an even smaller area of radio spectrum!

Sincerely,

Richard L. Merrill

Richard L. Merrill
1507 Wildwood Lane
Lutz, FL 33549

1-21-93

The Honorable Michael Bibrakis
United States House of Representatives
Washington, D.C. 20515

JAN 21 1993

In Reference NPRM-PR DOCKET 92-235

I am an R.C. Modeler & have been
since 1954.

The AMA along with the FCC spent
many years & money to establish our
anchored Frequencies.

Now a new Director & new Commis-
sioners want to make them worthless
by adding Pager service only 2.5 KHZ
away from us. We are told our new
& expensive Equipment can not handle
this close spacing.

I have 6 old wide band Radio
Control Transmitters & Receivers that
became useless & unlawful to use
when this new Equipment came in
in 1991.

I don't need my new Radios to
become useless.

Thank you
H.M. Stillwagon
4421 Lane Rd
Zephyrhills Fl.
33541

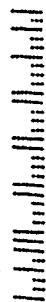
9 M. Stellingen
Margaret A. McLaughlin
4421 Lumsden Ave. S.W.
Seattle, WA 98148



STANDARD
PLANT CITY
FEB 25-MAR

CHS
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*The Honorable Michael Bilirakis
United States House of Rep.
Washington, D.C.
20515*



Jan. 21, 1993

JAN 26 1993

The Honorable Mike Bilirakis
U.S. House of Reps.
Washington, D.C. 20515

Re: FCC ACTION - NPRM PR DOCKET 92-235

The Honorable Mike Bilirakis:

I am retired and derive many hours of pleasure from building and operating radio controlled models and am active in our local club of 130 members.

I own five pieces of radio equipment worth approximately \$1,800 that would be rendered unusable if this frequency assignment is adopted. The models I build weigh as much as 20 pounds and operate up to 100 mph. Our club of 130 members operates at a public park where safety is a primary concern.

I am enclosing a copy of a form letter for further information. Please help me discourage the FCC from carrying out this proposal.

Yours truly,



Donald E. Crowell
9741 Cypress Shadow
Tampa, Fl 33647

Page 2

FORM LETTER

I am very concerned about proposed rules that are currently under consideration by the Federal Communications Commission (FCC). The proceeding is PR Docket 92-235. If adopted, the new rules will greatly reduce the usability of frequencies currently assigned for model use and increase the risk of accidents and attendant liability for controlling model airplanes.

Our radio control frequencies are in the 72 - 76 MHz band. This band is primarily used for private land mobile dispatch operations. However, our radio control frequencies in this band are far enough apart from the land mobile frequencies that we have been able to share the band without either use interfering with the other.

Now the FCC wants to create more land mobile frequencies by splitting them into narrower bandwidths and rearranging the band plan. As a result, many land mobile frequencies will move closer to the radio control frequencies and cause interference to radio control operations. I am told that of the 50 frequencies that are presently available for radio control of model airplanes, only 19 frequencies will be left if these new rules are adopted.

When we fly our model airplanes under radio control, we go to great lengths to assure the safety of the operators and bystanders and the protection of property. Many of our safety precautions involve the careful coordination and use of the radio control frequencies. If the number of usable frequencies is diminished as proposed by the FCC, the remaining frequencies will become congested and the margin of safety will be greatly decreased.

Please understand that many model airplanes have wing spans up to 10 feet and weigh as much as 30 or 40 pounds. The models themselves are expensive to build; but more to the point, they are capable of causing property damage, serious injury, or even death if radio interference causes the operator to lose control of the craft. We often fly our models at organized events and contests where hundreds of operators participate. We need the use of our full complement of radio frequencies in order to assure a safe flying environment.

I do not think it is wise of the FCC to seek to improve the operating conditions of land mobile radio users at the expense of radio control modelers. The FCC may not think we are as important as business users of radios, but we have a considerable investment in our models and in our radio equipment. The hobby provides many hours of enjoyment to thousands of people like myself and contributes to the advancement and development of the commercial aviation industry.

Please help me continue the safe enjoyment of my pastime by not allowing the FCC to carry out its proposals for the 72-76 MHz band.